



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EMR/JEA  
F. # 2018R02232

*271 Cadman Plaza East  
Brooklyn, New York 11201*

November 9, 2022

By Electronic File Sharing and ECF

Henry E. Mazurek, Esq.  
Meister Seelig & Fein LLP  
125 Park Avenue  
7th Floor  
New York, NY 10017

Re: United States v. Jacob Daskal  
Criminal Docket No. 21-110 (NGG)

Dear Counsel:

Enclosed please find a disclosure, as well as the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

Enclosed please find:

- \*Cell site data for telephone number ending 9128, which contains Sensitive Discovery Material, Bates-numbered DASKAL000575-DASKAL001652;
- \*A video created in or about May 2018 of excerpts of a Red LG Phone, which contains Sensitive Discovery Material, Bates-numbered DASKAL001653; please note that a complete extraction of that phone was previously provided to you in July 2021;
- \* Pictures of Instagram messages, which contain Sensitive Discovery Material, Bates-numbered DASKAL001654-DASKAL001656;
- \* The results of a search performed by a law enforcement agent of an email account belonging to the victim for the email account which contain Sensitive Discovery Material, Bates-numbered DASKAL001657-DASKAL001662;

## II. The Government's Disclosure

In addition, the government writes to inform you, in an excess of caution, and in excess of its obligations under Brady v. Maryland, 373 U.S. 83 (1963), that a law enforcement agent searched an email account belonging to the victim of the below words and retrieved no results:

- “Jacob”
- “Yanki”; and
- 

The results of those searches are enclosed, and contain Sensitive Discovery Material, Bates-numbered DASKAL001663-DASKAL001665.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Erin Reid  
Erin Reid  
Jonathan Algor  
Assistant U.S. Attorneys  
(718) 254-6361

Enclosures

cc: Clerk of the Court (NGG) (by ECF) (without enclosures)